

MICHAEL R. PANDULLO
Nevada Bar No. 10707
10170 W Tropicana Ave 156-289
Las Vegas, Nevada 89147
Telephone: (702) 580-4936
Fax: (702) 405-0826
Email: Michael@PandulloLaw.com
Attorney for Defendant JONATHAN ULIBARRI

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,

Plaintiff,

vs.

JONATHAN ULIBARRI,

Defendant.

Case No. **2:18-cr-00007-RFB-VCF**

**STIPULATION TO CONTINUE
HEARING DATE
(Third Request)**

IT IS HEREBY STIPULATED AND AGREED, by and between DAYLE ELIESON, United States Attorney, and DANIEL J COWHIG, Assistant United States Attorney, counsel for Plaintiff the United States of America, and MICHAEL R. PANDULLO, ESQ., counsel for Defendant JONATHAN ULIBARRI, that the sentencing currently scheduled for December 13, 2018, at the hour of 10:00 a.m., be vacated and reset to a date and time convenient to this Court, but in no case any sooner than Thirty (30 days).

This Stipulation is entered into for the following reasons:

1. Council for the defendant cannot be present due to a scheduling conflict.
2. Counsel has spoken to Assistant United States Attorney Daniel Cowhig and he has no opposition to the continuance.

1 3. The additional time requested herein is not sought for purposes of delay, but merely
2 to allow counsel for Defendant sufficient time within which to effectively and
3 thoroughly prepare for the sentencing hearing.

4 4. Additionally, denial of this request could result in a miscarriage of justice.

5 5. This is the third request to continue this sentencing hearing.
6

7
8 DATED this 12th day of December, 2018.

9 BY:

10 MICHAEL R. PANDULLO, ESQ.

DAYLE ELIESON
UNITED STATES ATTORNEY

11 DANIEL J. COWHIG
12 ASSISTANT UNITED STATES ATTORNEY

13 /s/ Michael R. Pandullo

/s/ Daniel J. Cowhig

14

MICHAEL R. PANDULLO, ESQ.
15 *Attorney for Defendant JONATHAN*
ULIBARRI

DANIEL J COWHIG
Attorney for the United States

MICHAEL R. PANDULLO
Nevada Bar No. 10707
10170 W Tropicana Ave 156-289
Las Vegas, Nevada 89147
Telephone: (702) 580-4936
Fax: (702) 405-0826
Email: Michael@PandulloLaw.com
Attorney for Defendant JONATHAN ULIBARRI

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,

Plaintiff,

vs.

JONATHAN ULIBARRI,

Defendant.

Case No. **2:18-cr-00007-RFB-VCF**

**FINDINGS OF FACT,
CONCLUSIONS OF LAW
AND ORDER**

(Third Request)

FINDINGS OF FACT

Based on the pending Stipulation of counsel, and good cause appearing therefore, the Court finds that:

1. Defendant does not object to this continuance.
2. Counsel has spoken to Assistant United States Attorney Daniel Cowhig and he has no opposition to the continuance.
3. The additional time requested herein is not sought for purposes of delay, but merely to allow counsel for Defendant sufficient time within which to effectively and thoroughly prepare for the sentencing hearing.
4. Additionally, denial of this request could result in a miscarriage of justice.
5. This is the third request to continue this sentencing hearing.

- 1
- 2
- 3
- 4
- 5
- 6
- 7
- 8
- 9
- 10
- 11
- 12
- 13
- 14
- 15
- 16
- 17
- 18
- 19
- 20
- 21
- 22
- 23
- 24

///
///
///
///
///
///
///
///

ORDER

IT IS HEREBY ORDERED that sentencing currently scheduled for December 13, 2018, at the hour of 10:00 a.m., be vacated and continued to the 18th day of January, 20 19, at the hour of 10:00 a.m./p.m. in Courtroom 7C.

DATED this 13th day of December, 2018.



RICHARD F. BOULWARE, II
UNITED STATES DISTRICT JUDGE

Submitted by:

/s/ Michael R. Pandullo

MICHAEL R. PANDULLO, ESQ.
Attorney for Defendant JONATHAN ULIBARRI